

**UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

UNITED STATES OF AMERICA,)
)
)
Appellee,)
)
)
vs.) No. 24-3021
)
)
MURALI VENKATA,)
)
)
)
Appellant.)
)

**APPELLANT'S UNOPPOSED MOTION FOR
45-DAY EXTENSION OF TIME WITHIN WHICH TO FILE
APPELLANT'S OPENING BRIEF**

Appellant Murali Venkata, through undersigned counsel, respectfully moves this Court, pursuant to Circuit Rule 28(e), for a 45-day extension of time, from September 22, 2025, to November 6, 2025, within which to file his opening brief. Oral argument has not yet been scheduled. The government does not oppose this request. As grounds for this motion, undersigned counsel states:

1. On April 11, 2022, Mr. Venkata was convicted of conspiracy to defraud the United States in violation of 18 U.S.C § 371 (Count 1); theft of government property in violation of 18 U.S.C. § 641 (Count 2); wire

fraud in violation of 18 U.S.C. § 1343 (Count 11); and destruction, alteration or falsification of records in federal investigations in violation of 18 U.S.C. § 1519 (Count 16).

2. On January 26, 2024, Mr. Venkata was sentenced to 4 months of incarceration to be followed by 24 months of supervised release. The district court ordered that Mr. Venkata serve the first 8 months of his term of supervised release on home confinement.

3. Mr. Venkata completed his term of incarceration on June 28, 2024, and is currently serving his term of home confinement, which will expire in February of 2025.

4. On November 4, 2024, this Court granted Mr. Venkata's motion to hold his appeal in abeyance pending the Supreme Court's decision in *Kousisis v. United States*, 23-909.

5. On May 22, 2025, the Supreme Court issued its ruling in *Kousisis*.

6. On June 24, 2025, this Court issued a briefing schedule under which appellant's opening brief is currently due on September 22, 2025.

7. Given counsel's other obligations before this Court and in the district court, counsel requests additional time to prepare appellant's opening brief.

8. Counsel for the government has indicated that it does not oppose this extension request.

WHEREFORE, Mr. Venkata respectfully requests that this motion be granted and order appellant's opening brief due no sooner than November 6, 2025.

Respectfully submitted,

A. J. KRAMER
FEDERAL PUBLIC DEFENDER

/s/
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CERTIFICATE OF COMPLIANCE WITH TYPE-VOLUME LIMITATION

I hereby certify, pursuant to Federal Rule of Appellate Procedure 32(a), that the foregoing Motion to Govern was prepared in monospaced typeface using Microsoft Word Times New Roman 14-point font and contains 336 words in compliance with the Court's type-volume limits.

/s/
MATTHEW L. FARLEY
Assistant Federal Public Defender